

Presentment/Hearing Date: December 19, 2018 at 10:00 A.M.
Objection Deadline: December 12, 2018 at 5:00 P.M.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

LEHMAN BROTHERS HOLDINGS INC., et al.

Chapter 11

Case No. 08-13555 (SCC)

Debtors.

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**AMENDED NOTICE OF PRESENTMENT OF PROPOSED ORDER PURSUANT
TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2004 DIRECTING
EXAMINATION AND PRODUCTION OF CERTAIN DOCUMENTS**

PLEASE TAKE NOTICE that Fondo de Proteccion Social de los Depositos Bancarios, f/k/a Fondo de Proteccion Social de los Depositos Bancarios y Proteccion Bancaria (“FOGADE”), by and through its attorneys, White & Wolnerman, PLLC, will seek entry of an order (the “Amended Proposed Order”) pursuant to Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”): (i) authorizing the issuance of third party subpoenas, including subpoenas directed to Euroclear Brussels, Clearstream, Smith Rocke, Ltd. Or their representatives related to distributions made on account of the structured notes which are the basis for FOGADE’s allowed distributions; and (ii) authorizing, as may be necessary, the submission of commissions to allow for the discovery outside of this District and overseas, by presenting the Proposed Order to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, One Bowling Green, New York, NY 10004, on December 19, 2018 at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Application shall be in writing, shall be served upon the undersigned attorneys for FOGADE

with a courtesy copy to Chambers, so as to be received by December 12, 2018 at 5:00 p.m.; and shall be filed with the Bankruptcy Court together with proof of service.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed a hearing to consider the relief requested in the Application will be held on December 19, 2018 at 10:00 a.m. before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, One Bowling Green, New York, NY 10004.

PLEASE TAKE FURTHER NOTICE that the Order may be entered without a hearing unless a timely objection is made.

PLEASE TAKE FURTHER NOTICE that replies to any objections shall be filed no later than August 10, 2018.

Dated: New York, New York
December 5, 2018

WHITE & WOLNERMAN, PLLC

By: /s/ Randolph E. White
Randolph E. White
950 Third Avenue, 11th Floor
New York, New York 10022
Counsel to FOGADE